

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

**IN RE:**

**SCHNAVIA K. MOESLY,**

**Case No. 19-00115  
Chapter 13**

**Debtor.**

**MOTION TO SELL REAL ESTATE**

**COMES NOW** the Debtor, by counsel, James T. Kratovil, Esquire, and Kratovil Law Offices, PLLC, and moves the Court for an Order allowing her to sell her property located at 3332 Yellow Flower Road, Laurel, Maryland 20724, for the amount of Three Hundred Thousand Dollars (\$300,000.00). Further, the Debtor would represent:

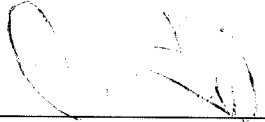
1. That the Debtor filed a voluntary petition under Chapter 13 of the United States Bankruptcy Code on February 19, 2019;
2. That the Debtor's Chapter 13 Plan was confirmed on May 17, 2019;
3. That the name and address of the purchaser is Marie J. Lacroix who currently resides at 521 Pickwick Village Way, Silver Spring, Maryland, 20901.
4. That there is a first deed of trust on the real estate owed to Community Loan Servicing, LLC, as servicer for JPMorgan Chase Bank, National Association, in the approximate amount of Two Hundred, Eighteen Thousand, Three Hundred, Seventy-One Dollars and Forty-Nine Cents (\$218,371.49).
5. That upon information and belief, Community Loan Servicing, LLC, as servicer for JPMorgan Chase Bank, N.A., has agreed to accept the amount of Two Hundred, Fifty-Five Thousand Dollars (\$255,000.00). as payment in full of its lien.
6. That there is a second deed of trust on the real estate owed to Navy Federal Credit Union in the approximate amount of Fifty Thousand, Two Hundred, Ninety-Five Dollars, and

Seventy-Nine Cents (\$50,295.79).

7. That upon information and belief, Navy Federal Credit Union has agreed to accept the amount of Fifteen Thousand, Eighty-Five Dollars, and Eighty-Two Cents (\$15,085.82) as payment in full of its lien.
8. That the Debtor proposes that the proceeds of sale will be distributed as follows:
  - A. That the costs of the sale including reasonable attorney's fees and realtor fees shall be paid, at the closing, to the closing attorney or firm and realtor;
  - B. That the Seller's broker shall be paid at the closing a broker commission of two percent (2%);
  - C. That the Local Listing broker shall be paid at the closing a broker commission of two percent (2%);
  - D. That the Buyer's broker shall be paid at the closing a broker commission of two percent (2%);
  - E. That James T. Kratovil shall be paid a fee of \$1,500.00 for his efforts in negotiating the short sale.
  - F. That Community Loan Servicing, LLC, as servicer for JPMorgan Chase Bank, National Association, will be paid the amount which it has agreed to accept as payment in full of its first deed of trust.
  - G. That Navy Federal Credit Union will be paid \$15, 085.82 as payment in full of its lien.
  - H. That the closing agent shall mail a copy of the HUD-1 settlement statement to the Chapter 13 Trustee, Helen M. Morris, P.O. Box 8535, South Charleston, WV 25303.
  - I. In the event there are remaining proceeds, the closing agent shall mail a check to

the Chapter 13 Trustee, Helen M. Morris, P.O. Box 2207, Memphis, TN, 31801-2207.

**WHEREFORE** the Debtor prays that she be allowed to sell her real estate on the terms outlined above.



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**SCHNAVIA K. MOSESLY,**  
Debtor,  
By counsel.

**CERTIFICATE OF SERVICE**

I, James T. Kratovil, Esquire, counsel for Debtor, hereby certify that I served a copy of the foregoing ***Motion to Sell Real Estate*** upon the following on this the 21<sup>st</sup> day of May, 2021:

Served by first class U.S. Mail, postage prepaid:

Schnavia K. Mosesly  
457 Hughs Road  
Charles Town, WV 25414-5533

Van Johnson  
Frontier Realty Group  
9701 Apollo Drive, #401  
Upper Marlboro, MD 20774

Patrick Butler  
BK Global, Inc.  
1095 Broken Sound Parkway, Suite 100  
Boca Raton, FL 33487

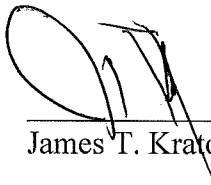
Served electronically via ECF on:

Meagan Preece [mapreece@wvtrustee.org](mailto:mapreece@wvtrustee.org)  
on behalf of  
Trustee Helen M. Morris

Helen M. Morris [ch13info@wvtrustee.org](mailto:ch13info@wvtrustee.org)

United States Trustee [ustpreion04.ct.ecf@usdoj.gov](mailto:ustpreion04.ct.ecf@usdoj.gov)

Those parties who requested electronic service by filing notice with the clerk's office were served by electronic transmission.

  
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James T. Kratovil